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ABSTRACT

The Vocational Education Act of 1963 allows public agencies to purchase the services of private vocational schools on a contractual basis where such schools can make a significant contribution to attaining the objectives of the state plan for vocational education and provide substantially equivalent training at a lower cost or can provide equipment and services not available in public institutions. Because so few states used these private resources between 1973 and 1977, a study was undertaken to review the extant literature to determine the legal, administrative, and attitudinal barriers to contracts between public and private vocational schools. It was found that (1) statutes in many states do not provide authority for such contracting or are unclear about the existence of such authority; (2) most states lack administrative procedures for managing contracts with private vocational schools; (3) accreditation and trade regulation policies need to be developed and enforced so that abuses by private vocational schools of federal loan and grant programs, as well as other fraudulent practices, will be eradicated; (4) the major barrier to effective use of private school resources appears to be the attitude of local and state authorities who not only regard proprietary schools as inferior but distrust profit-motivated education and fear their competition; and (5) because of the lack of information on the administrative, legal, and attitudinal issues, further research is necessary to identify incentives for the more effective use of private vocational schools and, in particular, to examine the extent of attitudinal barriers. (ELG)

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# PRIVATE VOCATIONAL SCHOOLS AND PUBLIC POLICY

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The Institute addresses policy issues central to educational finance and governance such as equity in resource allocation, uses of educational assessment, and effectiveness of alternative educational strategies. These problems are approached from an interdisciplinary perspective: educational, administrative, sociological, political, economic, legal, and anthropological.

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Joel S. Berke, Director

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# PRIVATE VOCATIONAL SCHOOLS AND PUBLIC POLICY

## Introduction

Private vocational schools* have become an increasingly visible component of American education. For a price, these schools promise to teach marketable skills more effectively and quickly than their public counterparts. They dispense with the frills of liberal arts education, specializing instead in training students in their chosen professions in conditions which presumably resemble the ones they will face when they begin work.

Many of these schools teach subjects that public vocational programs do not offer,e.g., bartending, aviation, computer maintenance, casino card-dealing and underwater construction. Both because of this gap in public vocational programs and because of the changing perceptions of the role of education in the United States, the Vocational Education Act allows public agencies to purchase the services of these schools on a contractual basis where such schools can (1) make a significant contribution to attaining the objectives of the state plan for vocational education and (2) provide substantially equivalent training at a lower cost; or (3) provide equipment or services not available in public institutions.[1]

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*The term "private vocational schools" as used in this paper refers to both private nonprofit and proprietary institutions.

[1] Vocational Education Act of 1963, Section 120(b)(1)(N) 20 U.S.C. 2330(b)(1)(N)(1978).

An examination of Fiscal Year 1977 state plans for vocational education at the U. S. Office of Education, however, reveals few states actually plan for the use of contracted instruction or set money aside for that purpose. A recent General Accounting Office report was critical of the states' failure to utilize the resources of private vocational schools more effectively. The report noted that frequently little consideration is given to the shared use of public training facilities or to cooperative arrangements with other agencies, organizations, and institutions despite indications that more vocational programs could be offered and that the service could be delivered more economically.[1] To better understand the legal and statutory barriers to contracting, the U. S. Office of Education issued RFP 76-42 for "A National Study of State and Outlying Area Statutes Influencing Vocational Education that Possibly Prevent Public Schools From Using Private Training Sources." The Education Policy Research Institute (EPRI) of the Educational Testing Service (ETS) was awarded the contract to conduct this study. This paper reviews the extant literature on private vocational education in order to determine the legal, administrative and attitudinal barriers to contracting at the federal, state and local levels.

A review of the literature on contracting between public schools and private vocational schools is no easy task, since little of the literature on vocational education exam-

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[1]General Accounting Office, "What is the Role of Federal Assistance for Vocational Education?" (Washington, D. C.: General Accounting Office, 1974).

ines private vocational schools. A brief examination of the card catalog at one of the nation's foremost libraries of education reveals less than ten entries on the subject in nearly two drawers of listings on vocational education in general.[1] This absence of literature is especially peculiar considering there are about 10,000 proprietary vocational schools in the U.S., with a total enrollment of between 1.6 and 3 million students.[2]

To analyze the contractual use of private vocational schools by public education agencies, we begin by reviewing the growing interest in vocational education. Next the paper reviews the primary impediments to more extensive contracting: the vague status of state laws and regulations, administrative problems, and the regulation and accreditation of private vocational schools. Finally, the paper considers the major federal programs that authorize public use of private vocational schools. The central theme throughout this paper is that private vocational schools are a valuable

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[1]The American Vocational Association's first yearbook, for example, (Gordon F. Law, ed. Contemporary Concepts in Vocational Education, Washington, D.C., American Vocational Association, 1971) devotes only four of its 425 pages to the subject. Carl J. Schaefer & Jacob J. Kaufman (New Directions in Vocational Education, Lexington, Mass., Heath Lexington Books, 1971) proposes a state model for occupational education in Massachusetts which mentions private vocational schools as evidence of the failure of two-year community colleges to teach occupational skills, rather than as an important component of the vocational education universe.

[2]Welford W. Wilms, Public and Proprietary Vocational Training: A Study of Effectiveness. (Lexington, Heath Lexington Books), 1971.

educational training resource that has, to date, been largely neglected by vocational educators. The reasons these schools have been ignored, however, seem to have received scant attention from scholars concerned with vocational training.

## The Growing Importance of Vocational Education and Private Vocational Schools

Polls and national surveys have repeatedly demonstrated that Americans value education primarily as a mechanism to prepare them for work, better jobs and economic success. A 1972 Gallup Poll concluded, for example, that Americans "firmly believe that education is the royal road to success in life." When asked why they wanted their children to get an education, 44 percent replied "to get better jobs;" 38 percent answered "to work, make money, achieve financial success."[1]

Traditionally, these attitudes have encouraged parents to send their children to college. In the last thirty-five years, college enrollments have grown dramatically from 1,350,000 in 1940 to 10,137,065 in 1975.[2] The increase in enrollments, of course, has produced more college graduates seeking employment at a level commensurate with their

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[1] National Advisory Council for Career Education, Interim Report with Recommendations for Legislation (Washington, D. C., November 1975) pp. 20-21.

[2] W. Vance Grant and George Lind, Digest of Education Statistics, 1975 Edition (Washington, D. C.: U.S. Government Printing Office), 1976.

educational background. The result is that more college graduates are filling clerical and manual jobs than ever before. The labor market, however, has been unable to absorb all those seeking employment at a level commensurate with their educational background. The result is that more college graduates are filling clerical and manual jobs than ever before. Newsweek, in a 1976 cover story "Who Needs College?"[1] told some grim tales: A Columbia Ph.D. and former Fullbright Scholar now works as a welder in Kansas; a University of Colorado Phi Beta Kappa graduate works in a San Francisco restaurant; a former college-level Spanish teacher with a Ph.D. and two master's degrees has not been able to find full time teaching since the college she formerly taught at closed in 1972. In a more scholarly vein, Harvard economist Richard Freeman writes:

> "By all relevant indicators, the economic status of college graduates deteriorated relative to that of other workers, with with the employment situation of the young falling exceptionally sharply."[2]

Student concerns over future employment opportunities have encouraged the development of new programs to help identify and explore career options that do not require a four year

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[1] "Who Needs College", Newsweek, April 26, 1976.

[2] Richard B. Freeman, The Overeducated American (New York, Academic Press), 1976. In the same vein, see James O'Toole, "Too Much Education For the Job", Washington Post, May 18, 1975, p. C1 and Caroline Bird, The Case Against College (New York: David McKay Company), 1975.

college education.[1] Public policy has encouraged this ment through legislation such as the Career Education and Career Development program, enacted as part of the Vocational Education Amendments of 1976.[2]

Concomitant with the increased interest in careers that do not require a college education is the broadening of the educational mainstream. The term "higher education" has been superseded by the term "postsecondary education" to reflect the broadening of public conceptions about the nature of education beyond high school. According to Orlans,

> The emergence of "postsecondary" education is attributable to many factors, including declining public esteem for higher education following the disruptions of recent years; the rising costs of college and the declining employability of many graduates; the effort to tie the nation's educational expenditures more closely to its manpower needs; the effort to increase the practical usefulness of advanced education.... "postsecondary education is an eminently democratic concept that seeks to equate, for purposes of public policy, planning, and student aid, the education of physicians and nurses aides, of psychiatrists and plumbers, of Ivy League Freshmen and 17-year-old high school dropouts who return to school to learn a trade.[3]

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[1] Carnegie Commission on Higher Education, Toward A Learning Society: Alternative Channels to Life, Work and Service. (New York, McGraw-Hill) 1973. See also D. Trivett, Proprietary Schools and Postsecondary Education, Washington, ERIC Research Report #2) 1974.

[2] Career Education was first enacted in 1974 as Section 406 of Public Law 93-380 (Education Amendments of 1974). In a similar vein see also Title X of the Higher Education Act -- Community Colleges and Occupational Education.

[3] Harold Orlans, et. al., Private Accreditation and Public Eligibility. (Washington, D.C.: National Academy of Public Administration) 1974, pp. 269-270.

As a result of this change, private vocational schools began to receive more attention, if not more legitimacy. Orlans notes:

> In recent years, fortune has smiled on proprietary schools. Federal and state legislatures have liked their practical, no frills outlook (and their lack of critical philosophizing, political activism, or student protest), their comparative cheapness their experience in conveying useful skills quickly, their attitude of serving rather than disdaining industry, their ready adaptability to changing market demands and active interest in placement. To many, they have seemed a useful counterweight to the academicism of liberal arts colleges and the ineffectiveness of training in large and unruly public junior colleges and technical institutes.[1]

Congress has sought to recognize the contribution of these schools. In 1968, contractual relationships between public education agencies and private vocational training institutions were authorized.[2] In 1972, Congress allowed private vocational schools to receive money under the federal student assistance programs.[3] In addition, private vocational schools are eligible to participate in federal manpower and veterans' benefits programs.

The use of these schools to supplement public training programs would seem to serve important public policy goals.

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[1] Orlans, Private Accreditation and Public Eligibility, pp. 282-283.

[2] Vocational Education Act of 1963, P.L. 90-576 Section 101(b), 82 stat. 1072, enacted Oct. 16, 1968.

[3] Higher Education Act of 1965, PL 92-318, Title I, Section 131(b)(1), 86 stat. 247, enacted June 23, 1972.

In this light, the provision for contracting included in Section 120(b)(1)(N) of the Vocational Education Act of 1963, as amended, is consistent with other federal legislation. This section authorizes the provision of vocational training through arrangements with private vocational training institutions where such institutions can make a significant contribution to attaining the objectives of the state plan, and can provide equivalent training at a lesser cost than public programs, or can provide equipment or services not available in public institutions.[1]

Despite this provision it appears that contracting takes place on a small scale if at all. Figures from the U.S. Office of Education show that for the years 1973 to 1976, contracting between local school districts and private vocational schools made up between .6 and 1 percent of the total federal outlays for vocational education under Part B of the Vocational Education Act. The extent of contracting is summarized in Chart 1.[2]

## Private Vocational Schools and Public Services

The literature on private vocational schools suggests these institutions offer numerous educational advantages to

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[1]Vocational Education Amendment of 1963, Sec. 120 (b)(1)(N) (7) 20 U.S.C.2330(b)(1)(N) (1978).

[2]U.S. Department of Health, Education and Welfare, U.S. Office of Education. Bureau of Occupational and Adult Education. Vocational and Technical Education: Selected Statistical Tables. Tables 6, 19; 1973 through 1976. (Washington D.C., U.S. Government Printing Office, 1974-1977).

CHART 1

Expenditures For Contracted Instruction Under Part B of the Vocational Education Act for Fiscal Years 1973-1976

| | Fiscal 1973 | Fiscal 1974 | Fiscal 1975 | Fiscal 1976 |
|---|---|---|---|---|
| Total Federal Part B Expenditures | $387,664,484 | $374,580,799 | 433,623,188 | 438,205,887 |
| Amount Spent on Contracted Instruction | $3,753,401 | 17,129,841 | 2,544,827 | 4,306,042 |
| Percent of Funds Spent on Contracted Instruction | 1% | 5%[1] | .6% | .9% |
| Number of States showing Expenditures for Contracted Instruction | 11 | 14 | 12 | 14 |

Source: U.S. Department of Health, Education and Welfare, U.S. Office of Education. Bureau of Occupational and Adult Education. Vocational and Technical Education: Selected Statistical Tables. Tables 6, 19; 1973 through 1976. (Washington D.C., U.S. Government Printing Office, 1974-1977).

[1]The expenditure total for Fiscal Year 1974 appears to be an aberration. In 1974, California reported spending $10,872,330 and Florida spent $5,028,492, amounts that are much higher than preceding or succeeding years. In Fiscal Year 1975, for example, California reported no expenditure for contracted instruction and Florida showed an expenditure of only $18,700. Officials in California and Florida were unable to explain why the 1974 expenditures were so high. U.S. Office of Education officials attributed the difference to a change in reporting procedures.

their public counterparts. Clark and Sloan's Classrooms on Main Street[1] and Belitsky's Private Vocational Schools and Private Vocational Schools and Their Students: Limited Objectives, Unlimited Opportunities[2] give thorough descriptions of the benefits of proprietary vocational education for the prospective student. Among the advantages these authors cite are flexibility in course offerings and scheduling, emphasis on highly specialized, skill-oriented instruction, attention to the needs of individual students, frequent class starts short duration of courses, and assistance in job placement. A 1972 study by the Inner City Fund concluded that proprietary schools had greater clarity of mission, better teaching and more institutional flexibility in meeting the changing demands of the labor market than public institutions.[3] Several other studies have outlined similar advantages offered by private vocational schools.[4]

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[1]Harold Clark & Harold Sloan. Classrooms on Main Street. (New York: Teachers College Press, 1966).

[2]A. Harvey Belitsky. Private Vocational Schools and Their Students: Limited Objectives, Unlimited Opportunities. (Cambridge, Mass., Schenkman) 1969; and Belitsky, Private Vocational Schools: Their Emerging Role in Postsecondary Education. (Kalamazoo, W. E. Upjohn Institute) 1970.

[3]Inner City Fund, Inc., Proprietary Business Schools and Community Colleges: Resource Allocation, Student Needs, and Federal Policies, (Washington, D.C.: Inner City Fund,Inc.) 1972.

[4]See for example Robert Peck, Proprietary Schools and Educational Planning: A Staff Report, (Salem, Oregon: Educational Coordinating Council), October 1970; and H. Kincaid and E. Podesta, An Exploratory Survey of Proprietary Vocational Schools (Palo Alto: Stanford Research Institute), 1966.

On the other hand, Wolman and Wilms found that the differences between public and private vocational education are more matters of taste than of substance. Wolman concludes that the quality of training in both types of schools is nearly identical in many fields despite the difference in teaching techniques. Both types of programs are effective; students who complete the courses experience comparable gains in their earning power.[1] Wilms found that there are cost advantages to proprietary because their courses are shorter than their public counterparts. He states:

> ...if the public student were not subsidized by taxes and paid the same charge to the school as the proprietary student, the total costs to the student ... would be almost equal. But...public teaching costs averaged 35 percent more than proprietary teaching costs. If the public student paid the entire cost, he would pay more. So proprietary training was a better investment for the student where the programs were designed was a better investment for the student where the programs were designed to last a minimum length of time, reducing the student's foregone income."[2]

While literature clearly indicates that the quality of education provided by private vocational schools is not a significant impediment to the issuance of contracts. it does not describe precisely where the problems and barriers do lie. It is at this point that the lack of information, either reliable or otherwise, is most apparent.

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[1]Jean Wolman, et. al. A Comparative Study of Proprietary and Non-Proprietary Vocational Training Programs. (Palo Alto: American Institutes for Research in the Behavioral Sciences), 1972 p. 117.

[2]Wilms, W. Public and Proprietary Vocational Training: A Study of Effectiveness.

## Barriers to Contracting

The issues that affect the provision of contracts to private vocational schools can roughly be divided into three parts; the status of the law, problems of the administration of contracts, and the varieties of regulation applicable to the schools. A constant element in all three is uncertainty about the level of jurisdiction that should be involved. Should the federal, state or the municipal government, the state or local board of education, or some other panel of experts establish policy and set guidelines for contractual relationships with private vocational schools? Because the "who governs" question cannot be discussed apart from the other three it will be integrated into the course of the discussion.

### Status of the Law

The passage of federal legislation enabling state and local agencies to issue contracts has not, as previously noted, resulted in extensive contracts between public education agencies and private vocational schools. One impediment to greater contracting appears to be the absence of express state statutory authority authorizing such contracting. In some states no such authority appears to exist. In other states it is not clear whether authority to enter into such contracts exists. In those states where the authority is clear, the administrative apparatus needed to grant and

regulate contracts is often poorly developed.[1] Gaffney et. al. have classified the legal status of contracting in states and territories into six categories. Their findings are summarized in Chart 2.

In short, state statutes in many states either do not provide express statutory authority for such contracting or it is unclear whether such authority exists. Thus, although federal authorization and funding exists for contracting, the absence of or the lack of clarity about such contacting authority appears to present formidable legal barriers at the state and local level. It should come as no surprise, then, that little, if any contracting takes place.

Administration of Contracts

Administrative obstacles to the issuance of contracts are as insidious as the legal barriers. For reasons that are not clearly stated in the literature, most states have not created administrative procedures for managing contracts with private vocational training institutions.[2] In these states, the counties, local boards of education or municipal authorities have not done so either. At present, those contracts

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[1] Edward Erikson, et. al. Proprietary Business Schools and Community Colleges: Resource Allocation, Student Needs and Federal Policies (Washington, D.C.: Department of Health, Education and Welfare), June 1972.

[2] If a state lacks legal authority to contract with private vocational training institutions, then it follows that the state will not have administrative procedures for managing such contracts.

CHART 2
STATUS OF STATE LEGAL FRAMEWORK FOR CONTRACTING
WITH PRIVATE VOCATIONAL TRAINING SOURCES

| Status of Law | Number of States |
|---|---|
| Both the State Board of Education and the LEA's appear to have authority to contract with private vocational training sources | 15 |
| Neither the State Board nor the LEA's appear to have authority to contract with private vocational training sources | 7 |
| The State Board appears to have authority to contract with private vocational training sources, but it does not appear that the LEA's do | 8 |
| It is unclear whether the State Board or the LEA's have authority to contract with private vocational training sources | 9 |
| The State Board appears to have authority to contract with private vocational training sources, but it is unclear whether the LEA's do | 16 |
| It is unclear whether the State Board has authority to contract with private vocational training sources, but it appears that SEA's do not | 1 |
| | 56 |

Source: Michael Gaffney, et. al. "A National Study of State and Outlying Area Statutes and Regulations related to Contracting with Private Vocational Training Sources for Vocational Instruction" (Washington, D.C., National Foundation for the Improvement of Education, July 1977). Gaffney et. al. carefully qualified their findings by stressing that their analysis was based primarily on a review of state statutes and regulations and did not include an analysis of judicial opinions in each state. In discussing the limitations of their research, they emphasized that "this report is no substitute for the opinion of a state attorney general which has carefully considered the relevant case law of a particular state," p. 7, (emphasis in the original).

in place are administered on an individual basis, mostly at the discretion of the local education agency (LEA), virtually without any form of state coordination.[1]

Few states appear to take account of private vocational schools in preparing their state plans for vocational education. A review of these plans indicates that most allow for contractual agreements between public schools and private educational agencies and institutions where: (1) public facilities are lacking; (2) instruction can be provided at a lower cost; and (3) private institutions can make a significant contribution. Few states, however, actually plan for the participation of private vocational schools by attempting to inventory either the manpower needs of the area or the private resources available to address them. Moreover, a study of state planning activities by Project Baseline found that states made little effort to encourage the participation of private vocational schools in formulating state plans.[2]

In an effort to broaden the planning base for vocational education, the 1976 Amendments to the Vocational Education

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[1] Postsecondary Education Convening Authority. "Approaches to State Licensing of Private Degree-Granting Institutions: The Airlie Conference Report" Washington D.C., George Washington University, Postsecondary Education Convening Authority, 1975.

[2] P. A. O'Reilly, The State Planning Process in Vocational Education (Flagstaff, Arizona: Northern Arizona University) 1975.

Act require the state advisory council for vocational education to include the active participation of members who represent a variety of perspectives in the development of five-year and annual program plans. These include state agencies for postsecondary vocational education, community and junior colleges, institutions of higher education and the state agency responsible for comprehensive planning in postsecondary education. In addition, Section 105 (a)(6 and 9) requires the state advisory council to include members who:

> (6) represent other institutions of higher education, area vocational schools, technical institutes, and postsecondary agencies or institutions which provide programs of vocational or technical education and training....(9) represent and are familiar with nonprofit private schools.[1]

Moreover, the legislation required the establishment of local advisory councils of vocational education. While these requirements imply Congressional concern and interest in the resources available through private vocational schools and seem to increase the possibility of contractual arrangements, it is too early to evaluate the impact of the new planning requirements.[2]

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[1] Vocational Education Act of 1976, Public Law 94-482, Sec. 105(a)(6-9) 20 USC 2230 (b)(1)(N)(1978).

[2] The report of the Senate Committee on Labor and Public Welfare emphasized the role that nontraditional providers of vocational education could play by specifying that the state plan "should give careful consideration to the most effective means of utilizing all existing institutions capable of carrying out vocational programs....The Committee would encourage states, in assessing available facilities to examine as wide as possible a range of facilities which might be useful in providing high quality vocational education." Cited in Gaffney, et. al. "A National Study..." pp. 27-28.

Because state boards and advisory councils have important responsibilities with respect to statewide policy, they are in a central position to encourage contracting with private vocational schools. Similiarly, local boards and advisory councils have important influence on policy at the local level. However, the impact of these bodies on state and local contracting policies has not been seriously investigated. Indeed, few state boards or advisory councils appear to have addressed the contracting issue directly. In 1972, the New Jersey Advisory Council on Vocational Education recommended the State Board of Education:

> support pilot projects for testing the feasibility of utilizing the proprietary schools on a contracting basis to render a vocational or occupational skill training service to students within a local education agency who need or desire such service but do not have access to skill training within the local district."[1]

However, there is little evidence of similar studies or analyses in other states. Any investigation of state and local boards and advisory councils should recognize the political factors that may influence the decision process. It is reasonable to assume that these bodies with heavy public representation might favor public over private institutions.

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[1] New Jersey Council on Vocational Education. Annual Report: An Evaluation of Vocational Education Programs, Services and Activities in New Jersey, September 1972, p. 13. Given the visible Congressional interest in the role of proprietary schools expressed in the Education Amendments of 1976, it is likely that more states will review the role and place of private vocational schools in the near future.

Experience suggests that community colleges, which strongly oppose the loss of funds to any competitor, would exercise political influence to affect resource allocation decisions. Erickson found that community colleges were able to divert federal funds targeted toward proprietary business schools to their own institutions, using them to improve their own vocational education facilities.[1] Such influence effectively prevented the use of contracts with private vocational schools in the district Erickson examined. One reason given for this diversion was the claim that education should be the exclusive province of public agencies rather than private companies.

Regulation and Accreditation

Most of the publicity that proprietary vocational schools have received has concerned the regulation (or lack of regulation) of their business practices. The Boston Globe Spotlight Team and Carl Bernstein of the Washington Post have written exposes of fraudulent practices including questionable recruiting techniques, deceptive advertising and the unavailability of information that the students would find valuable for making decisions to enroll in these schools.[1] In a 1972 study, the General Accounting Office found that three out of four veterans failed to complete correspondence

[1] Erickson, et. al. Proprietary Business Schools and Community Colleges, 1972.

courses from proprietary schools. The study suggested the Veterans Administration should provide better advice and assistance to veterans before they enroll.[2] In 1974 the Special Studies Subcommittee of the House Committee on Government Operations conducted an inquiry into proprietary schools, explored ways to limit the misuse of vocational training and to correct the abuses of misleading advertising, unethical recruiting, and the acceptance of unqualified students.[3]

These reports and news articles have provoked a debate on the merits of proprietary schools and encouraged a series of efforts to combat the fraudulent practices of some private vocational schools. The Education Commission of the States

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[1]See, for example, Carl Bernstein, "Hard Sell on Job Training, Career Schools: Promises at a Price" Washington Post, 13 July 1971; "The 'Real Money:' Signing Up Students" Washington Post, 13 July 1971; "'Deceptive' Career School Ads Cited by FTC" Washington Post, 14 July 1971; and the Boston Globe Spotlight Series, 25 March to 3 April 1974, page 1, with headlines such as "Career Schools Turn Education into a Fast Buck Industry," and "Career Schools Bully Students to Enroll."

[2]General Accounting Office. "Most Veterans Not Completing Correspondence Courses -- More Guidance Needed from the Veterans Administration" Washington, Comptroller General of the U. S., March 22, 1972.

[3]U.S. Congress House Committee on Government Operations Reducing Abuses in Proprietary Vocational Education. House Report 1649, 93rd Congress; 2nd Session, 1974. Although no legislation was enacted as a result of these hearings, the House Committee did recommend administrative changes for both the Department of Health, Education and Welfare and the Veterans Administration. However, neither HEW nor the VA made significant changes in their procedures as a result of these recommendations.

held two conferences on consumer protection in postsecondary education,[1] and has produced a model regulation to combat abuses by proprietary vocational schools. The Federal Trade Commission held hearings in 1974 on the control of the industry, and has proposed a series of stiff regulations which are still under consideration.

A central assumption of these studies is that proprietary vocational schools as a group depend for their survival upon unscrupulous business practices, and that students need protection from these schools as a group. These reports, articles and conferences differ only in their proposals for eliminating abuses. The solutions proposed by the various advocates can be classified as either state-level or federal-level in nature.

Federal Regulation -- The strongest proponent of a federal response to regulation of private vocational schools has been the Federal Trade Commission. In its hearings in 1974 and 1975,[2] it examined the control of deceptive advertising and sales techniques, the need for full disclosure of information such as placement statistics to the prospective

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[1]Education Commission of the States, "Consumer Protection in Postsecondary Education: Report of the National Invitational Conference." Report no. 53. Denver, June 1974; and "Report of the Second Annual Conference", Report no. 64, Knoxville, Tennessee, March 1975,

[2]Federal Trade Commission. Proprietary Vocational and Home-Study Schools: Final Report to the FTC and Proposed Trade Regulation Rule 16 CFR, Part 438 (ED 134 790).

student, the establishment of a "cooling-off period" in which the student could reconsider the decision to enroll before classes begin, and the creation of a uniform refund policy for students who do not complete courses. The hearings were based upon the assumption that these matters could best be controlled at the federal level, where nationwide uniformity of enforcement could best be ensured. Skepticism about the ability of state boards of education to effectively regulate these schools added to the tendency to prefer a federal solution.

State Regulation -- The most vocal advocate of legislation at the state level is the Education Commission of the States (ECS). In June 1973, the ECS Task Force on Model State Legislation for Approval of Postsecondary Educational Institutions and Authorization to Grant Degrees released a proposed model for state regulation of educational institutions.[1]

The Model ECS legislation includes provisions:

> (a) establishing minimum standards concerning quality of education, ethical and business practices, health and safety, and fiscal responsibility, to protect against substandard, transient, unethical, deceptive, or fraudulent institutions and practices;
>
> (b) prohibiting the granting of false or misleading educational credentials;

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[1] Education Commission of the States. "Model State Legislation: Report of the Task Force on Model State Legislation for Approval of Postsecondary Educational Institutions and Authorization to Grant Degrees" Denver, Colorado, June 1973), Report #39.

(c) regulating the use of academic terminology in naming or otherwise designating educational institutions;

(d) prohibiting misleading literature, advertising, solicitation, or representation by educational institutions or their agents;

(e) providing for the preservation of essential academic records; and

(f) providing certain rights and remedies to the consuming public...

ECS has encouraged the adoption of this legislation by the states. At present twenty-three states have adopted all or part of it.

Rather than creating a state commission whose only responsibility would be the regulation of private vocational school practices, the ECS model combines regulation with a proposed approval system for all postsecondary institutions. Operation within the state would be conditional upon approval by the commission and schools would not be approved if they did not meet the state standards. The benefit of such an approach is that the paperwork involved in federal regulation of proprietary vocational schools would be avoided, along with the problems of on-site inspection and enforcement. Moreover, since education policy is traditionally the responsibility of the states, this proposal has the added advantage of preserving the jurisdictional status quo. The drawback, however, is the considerable variation one might expect in standards and enforcement among states.

One constant theme throughout the literature on consumer protection is that only a few educational institutions consciously try to defraud the public. However, discoveries of

unscrupulous business practices seem to be found most frequently among private profit-making institutions. It is the widespread publicity given to these abuses that damages by association the reputation of all private vocational schools. A likely by product of these abuses is a disinclination by public education officials to enter into contracts with private schools. Whether the advent of greater regulation of the business practices of educational institutions will encourage more extensive contracting in the future remains to be seen.

Accreditation. Related to the regulation of private vocational schools is the process by which institutions become accredited. According to the U. S. Office of Education, accreditation is "the process where by an agency or association grants public recognition to a school, institute, college, university, or specialized program of study which meets certain established qualifications and educational standards, as determined through initial and periodic evaluations."[1] Traditionally, accreditation has been done by private groups and professional associations on a voluntary basis without government restraint or direction.[2]

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[1] Federal Register, August 20, 1974, "Commissioner's Recognition Procedures for National Accrediting Bodies and State Agencies",p. 30042.

[2] Clearly, accreditation applies to the recognition of institutions or programs of study. Licensure and certification, on the other hand, apply only to individuals. Licensure is the process by which states authorize individuals to practice an otherwise restricted profession; certification is the process by which states and professional bodies recognize the particular competence of individual practitioners. Anderson, Ball, Murphy, et. al., Encyclopedia of Educational Evaluation, pp. 4-8.

In 1952, Congress made institutional accreditation a requirement for eligibility to participate in Veterans Readjustment Act. In succeeding years, accreditation requirements have been written into every major piece of federal education legislation. The result is that accreditation by private bodies, although not subject to government restraint or direction, is required of educational institutions who wish to receive federal funds. Recently the accrediting agencies have received criticism for their passive role in ensuring the quality of the schools they administer. The Orlans study offers a history of accreditation in the United States and the multiple tasks it has been expected to accomplish,[1] as do the Airlie Conference Report[2] and the short pamphlet, "Gatekeepers in Education."[3]

Unlike medical or law schools, private vocational schools have no single nationwide agency which maintains minimum standards of educational quality. And unlike the American Medical Association and the American Bar Association, the Association of Independent Colleges and Schools (AICS) and

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[1]Orlans, Private Accreditation and Public Eligibility (1974), Sections A through F.

[2]Postsecondary Education Convening Authority. "Approaches to State Licensing of Private Degree-Granting Institutions: The Airlie Conference Report" (Washington, D.C., Georgetown University, 1975.

[3]"Gatekeepers in Education: A Report on Institutional Licensing" (Washington, D.C., National Advisory Council on Education Professions Development, 1975).

the National Association of Trade and Technical Schools (NATTS), the primary accrediting organizations for proprietary schools, see their task as ensuring that the private vocational schools under their jurisdiction live up to standards the schools set for themselves, rather than ensuring that they adhere to any minimum standards of educational competence or professional ethics. Although these two associations are the largest and best known accrediting bodies for private vocational schools, they register only a small percentage of such schools. Orlans, for example, estimated that of 10,000 postsecondary proprietary schools, only 1,600 to 1,700 were accredited in 1973.[1]. He comments:

> Many good and useful schools remain unaccredited and, conversely, many accredited schools offer poor and useless education. It is accredited correspondence, business, and trade schools which have posed the greatest problem in the federally insured student loan program, exploiting gullible students by representing their training and the likelihood that graduate will receive jobs.[2]

Thus, accreditation in the proprietary sector falls short of its ideal role of establishing minimum standards of quality and professionalism uniformly over the entire industry. The small number of accredited private vocational schools should not be taken as a commentary on the educational quality of the

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[1]Orlans, Private Accreditation and Public Eligibility, p. 298, Table 10. In 1978 AICS and NATTA, the primary accrediting agencies for proprietary institutions, accredited only 980 institutions between them.

[2]Orlans, Private Accreditation and Public Eligibility p. 253.

entire sector. Many institutions with high quality educational programs remain unaccredited. As Orlans suggests:

> Some schools remain unaccredited to maintain their program flexibility ...Expansion might require special approval from the agency or even dual accreditation; they prefer none. Others do not see what they would gain for the fee. State and city inspectors they cannot avoid; they do not want another set. Schools with a good reputation and a steady clientele may feel no need for accreditation.[1]

Despite the small percentage of accredited proprietary institutions, accreditation remains the primary standard for participation in many federal education programs. Although, there have been some proposals for modifications, there is little pressure for reform.[2]

For proprietary schools the issue of accreditation is directly related to the question of contracts. Accreditation is often seen as a badge of respectability and legitimacy and those who lack it are likely to be regarded as institutions of questionable quality. Some public bodies may be reluctant to risk criticism for spending public

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[1]Orlans, Private Accreditation and Public Eligibility P. 302.

[2]One area is the U.S. Office of Education's system of establishing criteria for recognition of accreditation agencies. The Educational Testing Service is making a study of the Office of Education's Division of Eligibility and Agency Evaluation in order to examine the criteria used to judge the competency of various accreditation agencies, including those regulating private vocational schools. The study, directed by Dr. J. R. Warren, will include analysis of questionnaires sent to faculty and administrators of accreditation institutions, employers of graduates of accredited programs, members of professional associations related to accreditation programs, staff members of state legislative committees concerned with accreditation, and representatives of accreditation agencies themselves.

dollars at an unaccredited institution regardless of its potential value. More importantly, since participation in federal and many state programs is primarily limited to accredited institutions, those who remain unaccredited, for whatever reason, are ineligible to participate. In many cases, however, unaccredited institutions are as respectable as accredited schools and can provide valuable education and training experiences. Yet until alternative mechanisms are available to evaluate the quality of unaccredited institutions and the services they provide, present accreditation practices will remain a barrier to contracting with private vocational schools.

## Federal Interest In Private Vocational Schools:

Although states have made little use of private vocational schools, the federal government has encouraged the utilization of these schools through manpower, veterans and student assistance programs. A brief review of the relevant federal programs in each of these areas reveals the extent of federal interest in the education and training opportunities private schools can provide.

### Employment Training Programs

In recent years, the federal government greatly expanded training and employment programs to increase employment opportunities and work skills of individuals who face employment barriers. Important federal initiatives include Title I

of the Comprehensive Employment and Training Act, the Job Corps (CETA-Title IV) Work Incentive Program, and the Youth Employment and Demonstration Projects Act (YEDPA). Many of these programs provide employment services and training to young people. In 1977, approximately 8.7 million youth were served by federal training and employment programs at a cost of $2.9 billion.[1] Although the Employment and Training Administration does not maintain records on the specific types of training received under these programs, one Labor Department official estimated that private vocational schools train more than 90,000 youth under CETA, Title I alone.

Private vocational schools also play an important role in providing education programs for veterans and their dependents. In fiscal year 1977, the federal government distributed $3.681 billion to veterans and eligible dependents of education benefits. Of this figure, over $635 million was spent on non-college training for correspondence schools, vocational-technical education, flight training, cooperative farm and technical high school education. In April 1978, the Veterans Administration indicated veterans were enrolled at 11,140 different institutions including "institutions of higher learning" and "non-college degree institutions."

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[1]Special Analyses, Budget of the United States Government, Fiscal Year 1979 (Washington, D.C.: U. S. Government Printing Office) 1978; p. 231.

The precise distribution of active institutions are described in Chart 3.[1]

A rough estimate of the number of private vocational schools at which veterans are enrolled can be obtained by subtracting the number of two and four-year colleges and universities in the United States (approximately 3,095 in

CHART 3
INSTITUTIONS ELIGIBLE TO PARTICIPATE IN
VETERANS BENEFITS PROGRAM

| | Public | Proprietary Profitmaking | Proprietary Non-profit | Total |
|---|---|---|---|---|
| Institutions of Higher Learning | 1,791 | 266 | 2,797 | 4,854* |
| Non-College Degree | 2,499 | 3,452 | 335 | 6,286 |
| TOTAL | 4,290 | 3,718 | 3,132 | 11,140 |

*Including 371 foreign schools.

Source: Veterans' Administration. Vocational Education Activities, Number of Institutions Establishments with Eligible Persons Enrolled under Chapter 34 and/or 35: U. S. Totals, All Regional Offices; Period ending April 1978.

[1]Veterans' Administration. Vocational Education Activities, Number of Institutions Establishments with Eligible Persons Enrolled under Chapter 34 and/or 35; U.S. Totals, All Regional Offices: Period ending April 1978. RCS 212-1.

1977-78)[1] from the above total. While the resultant figure, 8,045, is not precise (veterans might not be enrolled at all two and four-year colleges) it is clear that a substantial number of those 8,045 schools are private vocational schools at which veterans are enrolled.

Student Assistance Programs

Finally, some private vocational schools participate in the federal student assistance programs administered by the U. S. Office of Education (OE). According to Chart 4, nearly 8 percent of federal funds from the Basic Education Opportunity Grants (BEOG), College Work Study (CWS), Supplemental Education Opportunity Grants (SEOG), and National Direct Student Loans (NDSL) are spent in proprietary institutions.

In reality, the percentage of student aid funds going to private vocational schools is higher. The proprietary category includes only profit-making institutions -- a private non-profit vocational school would be counted as a private institution, regardless of its course offerings.

CHART 4
DISTRIBUTION OF FEDERAL STUDENT ASSISTANCE
FUNDS BY TYPE OF INSTITUTION
IN THOUSANDS OF DOLLARS

| Type of Institution | BEOG | NDSL | SEOG | CWS | TOTAL |
|---|---|---|---|---|---|
| Proprietary | | | | | |
| $ | $119,345 | $42,688 | $19,689 | $6,998 | $188,720 |
| % | 8.1 | 13.3 | 8.2 | 1.8 | 7.8 |
| Public | | | | | |
| $ | 975,811 | 106,286 | 138,182 | 263,312 | 1,537,591 |
| % | 66.2 | 49.9 | 57.6 | 67.6 | 63.4 |
| Private | | | | | |
| $ | 362,292 | 118,025 | 82,219 | 118,998 | 681,534 |
| % | 24.6 | 36.8 | 34.2 | 30.6 | 28.1 |
| Unclassified | | | | | |
| $ | 16,366 | | | | 16,366 |
| % | 1.1 | | | | .7 |
| Total | | | | | |
| $ | 1,473,814 | 320,999 | 240,090 | 389,308 | 2,424,211 |
| % | 100 | 100 | 100 | 100 | 100 |

Source: Office of Education Bureau of Student Financial Assistance Documents, Fiscal Year 1977.

## Conclusion

Although the lack of data makes it impossible to calculate the total federal funds that purchase instruction or services at private vocational schools or the number of students who benefit, it is clear that federal programs and policies have sought to recognize the potential contributions

of private vocational schools. The provision in the Vocational Education Act authorizing contracts is only one of several federal activities that encourage the use of private trade schools in meeting federal objectives. State and local education than have federal programs such as CETA, WIN, YEDPA and the Job Corps. The available literature only vaguely suggests the reasons for the general reluctance to arrange contracts. This paper has attempted to organize the scant information available in a manner designed to suggest the key dimensions of the barriers to contracting. If the relevant state legislation were enacted or clarified, if accreditation and trade regulation were reformed or if the state and local education administrations tightened up and/or specified their administrative procedures, contracts with private vocational schools might become more common.

The most important barrier to more effective use of private vocational schools by public authorities might well be attitudinal. Extensive conversations with vocational educators suggest that many educators view private vocational schools with scorn and hostility. Problems such as the highly publicized abuses of federal student loan and grant programs have cast a dark shadow on the good programs offered by many proprietary schools.[1] Other attitudinal problems

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[1]See, for example, Jo Thomas "Detroit Computer School is Focus of Case Alleging Cheating in Federal Aid Programs" New York Times, April 18, 1978, p. 20.

public officials appear to hold toward private vocational education facilities include "snobbery", a fear of competition, and a distrust of the profit motive in education. The underlying issues regarding public use of private vocational schools are matters of structure and attitude. Attitudes must change before structures can be reformed to reflect them.

The literature on private vocational schools focuses on structure and does not address directly the problem of inherent negative attitudes toward private vocational schools. Nonetheless, we believe that both attitudes and legal structural/administrative issues explain the absence of more contractual arrangements between private vocational schools and public agencies. Further investigation is necessary to examine the extent of the attitudinal barriers and to identify possible 'ncentives' to encourage more effective use of the resources offered by private vocational schools.

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